

DEPARTMENT OF HEALTH SERVICES

44 P STREET
SACRAMENTO, CA 95814



SEP 15 1988

To: All County Welfare Directors
All County Administrative Officers

Letter No.: 88-68

SUBJECT: SAVE POLICY

Reference: ACWDLs 88-59, 88-66 and 88-70.

The purpose of this letter is to provide policy information about the Systematic Alien Verification for Entitlements (SAVE) program. The Immigration Reform and Control Act of 1986 (IRCA) mandates the states to implement SAVE by October 1, 1988. SB 175 requires counties to use SAVE to verify the immigration status of aliens applying for or receiving Medi-Cal on or after October 1, 1988. The SAVE system will be functional by that date.

ACWDL 88-59 provides the SAVE primary verification system requirements and procedures. ACWDL 88-66 deals with policy aspects of IRCA, OBRA, and SB 175. ACWDL 88-70 describes Medi-Cal Eligibility Data Systems (MEDS) network changes and provides instructions for the correct reporting of alien codes to MEDS.

Background

Section 121 of IRCA requires Medicaid applicants to declare in writing their status as aliens or citizens. Aliens who do not have satisfactory immigration status (SIS) are ineligible for full-scope benefits. Under SAVE, counties must verify an alien's immigration status against Immigration and Naturalization Service's (INS) information.

SAVE is an inter-governmental information sharing program designed to aid eligibility workers in determining an alien's immigration status prior to the granting of federally subsidized benefits. Two methods are available through SAVE: primary and secondary verification. Primary verification is the automated way to verify the immigration status of aliens who have an alien registration number, also called an A number or A series number. The A number is a series of seven or eight digits following the letter A. The SAVE response indicates SIS, or the need for secondary verification. A response indicating SIS meets the alienage eligibility requirement.

SAVE Policy

You must verify the immigration status of alien applicants, except

undocumented aliens and temporary visa holders, beginning in October 1988. SAVE should not delay approval of benefits. You must continue to process an application within 45 days or, in a disability case, 60 days. On the other hand, you cannot grant full benefits to alien applicants whose SIS has not been verified through SAVE. Therefore, when SAVE verification is still in process and waiting for it would cause you to exceed the above time limits, you should issue restricted benefits. You can issue full benefits for the initial months once SAVE verification of SIS is completed later, as explained in ACWDL 88-66.

Do not use SAVE to verify the immigration status of undocumented alien applicants. If they claim to have SIS, they must obtain documentation of it to become eligible to full benefits. Until then, undocumented alien applicants are entitled to restricted benefits only, which consist of emergency and pregnancy-related services, provided they complete the applicable sections of the new MC 13 form, "Statement of Citizenship, Alienage and Immigration Status." Please refer to ACWDL 88-66 for more information.

Undocumented aliens, temporary visa holders and amnesty aliens 18 to 64 years old who are not blind or disabled (i.e. aliens who are only eligible to restricted benefits) who are currently receiving long-term care or renal dialysis services constitute a special class. Do not reduce their benefits because of their undocumented status. State law requires you to seek PRUCOL from INS for these undocumented aliens. We will give you further instruction soon.

For all other current alien beneficiaries, follow the instructions in ACWDL 88-66, including this one: "Existing beneficiaries who have documentation of SIS already on file are entitled to full benefits while SAVE verification is in process."

Comparing SAVE Data to Documentation

Some differences may occur when you compare SAVE data with data provided by the alien. The date of entry and social security number need not be considered for comparison of differences. Since the date of entry could be the alien's most recent entry into the U.S., it cannot be relied upon as indicative of when the alien was admitted as a lawful permanent resident. The INS does not have social security numbers for every alien on file. Items to check include the alien's registration number, name, date of birth, country of birth. Some differences are acceptable; when they are not, they require secondary verification. Acceptable differences are:

A name reversal with the last name appearing first.

A shortened name, especially Spanish names such as:

Maria de los Angeles	as	Maria Angeles
Juan Gomez y Conde	as	Juan Gomez Conde
Maria Gomez de Martinez	as	Martinez, Maria Gomez

A recent marriage may not reflect a name change.

A date of birth may have a transposed month and day elements, for example January 4, 1957 may appear as 040157 or 010457.

The country of birth may not be the country of nationality, i.e., state of legal allegiance.

The data received from the SAVE primary verification should be accurate and consistent with the information provided by the alien. The above examples are meant only as a guide. However, if you have any doubt as to the true identity or immigration status of the individual, do a secondary verification.

There are five possible primary verification responses. The first four indicate SIS:

1. Legal Permanent Resident - Employment Authorized.
2. Cuban/Haitian Entrant - Temporary Employment Authorized.
3. Section 245A Temporary Resident - Temporary Employment Authorized.
4. Section 210 Temporary Resident - Temporary Employment Authorized.

The third and fourth responses designate aliens who have been granted amnesty. Whether they are entitled to full benefits hinges on whether they are aged, blind, disabled or under 18. See ACWDL 88-66 for more information on benefit entitlements. The fifth response, "Institute Secondary Verification," is self-explanatory.

Secondary verification is a manual process completed by INS. It is required when SAVE's primary verification response is "Institute Secondary Verification", when you have doubts, or when there are discrepancies, such as:

1. The documentation presented by the alien appears counterfeit, altered, or unfamiliar.
2. The document does not have an A number but it notes an immigration status.
3. The A number is in the A 60,000,000 or A 70,000,000 series which, according to INS, has not been issued.

4. The A number is in the A 80,000,000 series which is used for illegal border crossings.
5. The document is an INS receipt.
6. The alien presents a foreign passport containing an I-181 or I-94 form which is over one year old and the statement "processed for I-551, Temporary Evidence of Lawful Permanent Residence."
7. The alien presents an I-688A with an A number in the A 90,000,000 series. These documents and numbers pertain to amnesty applicants; they require special handling.

Secondary verification requires you to complete INS' G-845 form, and to send the G-845 and readable photocopies of original documents to INS' File Control Office (FCO). Aliens who present form I-688 or I-688A, i.e. amnesty aliens, must complete a consent-of-disclosure statement too (Attachment 1). You must submit this statement also to INS' FCO. Directions for the completion of the G-845 are in Attachment 2 and in INS' SAVE Manual, which we hope to obtain and distribute to counties soon. INS promises to return the secondary verification information within ten working days.

INS will check the appropriate box on the G-845 after reviewing the submitted documents. Please see Attachment 3 for an explanation of possible secondary verification responses. Generally, responses 1 through 11 indicate lawful U.S. residence. The 12th response shows that the documentation is invalid and the alienage requirement is not met. Responses 13 through 16 require additional action to obtain an INS determination of immigration status. Aliens are permanently residing in the United States under color of law (PRUCOL) if box 18 is checked on the back of the G-845; response 17 indicates they are not PRUCOL. Any other INS comments will be included in response 19.

Aliens are responsible for presenting original INS documents, which should include a photograph whenever possible. If for any reason they cannot, they must request new documents from INS. Meanwhile, otherwise eligible aliens would be entitled to restricted benefits, as explained in ACWDL 88-66.

Among the documents that INS issues to lawful U.S. residents are:

Resident Alien Card (Form I-551)

Conditional Resident Alien Card (Form I-551)*

Alien Registration Receipt Card (Form I-151)

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Alien Registration Receipt Card (Form AR-3A)

Memorandum of Creation of Record of Lawful Permanent Residence (Form I-181)

Employment Authorization Card (Form I-688A)*

Temporary Resident Card (Form I-688)*

Re-Entry Permit (Form I-327)*

Refugee Travel Document (Form I-571)*

Arrival-Departure Record (Form I-94)* (This form does not always have an A number)

*If the expiration date has passed, the document is invalid; proceed as you would with an undocumented alien.

The chart in Attachment 4 indicates whether a primary or secondary verification should be completed. Attachment 5 is the SAVE primary verification screen.

INS is required to maintain a "Record of Disclosure" on all alien registration numbers checked through SAVE. INS will protect an individual's privacy as much as possible, in accordance with IRCA and other statutes. INS cannot use information obtained through a SAVE check to deport an alien or to enforce noncriminal immigration matters.

Please contact Elaine Bilot at (916) 323-4124, ATSS 8-473-4124, for SAVE policy; Tom Dickson at (916) 324-4961, ATSS 8-454-4961, on ACWDL 88-66; or your DHS MEDS liaison for systems-related questions. Thank you in advance for your cooperation.

Sincerely,

Original signed by

Frank S. Martucci, Chief
Medi-Cal Eligibility Branch

Attachment

cc: Medi-Cal Liaisons
Medi-Cal Program Consultants

Expiration Date: September 15, 1989

Consent of Disclosure

I freely and voluntarily waive the confidentiality provision of the Immigration Reform and Control Act of 1986 (IRCA) to permit the Immigration and Naturalization Service (INS) to provide

Agency: _____

my alien status for purposes of determining my eligibility for

Type of Benefit: _____

I understand that the Immigration Reform and Control Act of 1986 (IRCA) precludes the Immigration and Naturalization Service (INS) from using, publishing, or making available information related to my application for adjustment to temporary residence except as provided by law (confidentiality provision).

Name (Printed): _____

Signature: _____

Date: _____

March 31, 1988

Attachment Two

Directions for Form G-845

The G-845 should be completed as fully as possible. It is essential that the form contain enough information to identify the alien.

1. Alien Registration or I-94 Number: Enter the A-Number as the letter "A" followed by a series of seven or eight digits. You should include the Admission Number if available. The Admission Number is found on Form I-94 and in the Alternate ID field used on SAVE. The Admission Number may assist in the various searches made during secondary verification.
2. Applicant's Name: Enter last, first and middle names of the applicant. If the documentation indicated more than one variation of the name, enter all versions.
3. Nationality: Enter the foreign nation or country to which the applicant owes his allegiance. This is normally, but not always, the country of birth.
4. Date of Birth: Enter the birth date using the month-date-year format i.e. 01-12-66. If the complete date of birth is unknown, you should give all available information.
5. Social Security Number: Enter the alien's nine-digit Social Security Number if known. You should copy the number directly from the alien's Social Security card whenever possible.
6. Verification Number: Enter the Verification Number assigned from the SAVE primary search, if applicable.
7. Photocopy of Document Attached/Other Information Attached: Indicate that INS documentation is attached by checking the top box. The bottom box should be used if other information has been included in support or in lieu of INS documents.
8. Benefit/Your Case Number: Mark the blocks showing the entitlement benefit program(s) for which this alien has applied. The applicable case numbers should be noted or "pending" should be indicated if a case number has not yet been assigned.

The person submitting the G-845 should provide his name, title, telephone number and the current date. The name and address of the requesting agency or institution should be typed or stamped in the block labeled "From". The copies of the G-845 ordered from INS will include the address of the File Control Office responsible for processing the form.

U.S. Department of Justice
Immigration and Naturalization Service

Document Verification Request

1. Alien Registration or I-94 Number

2. Applicant's Name (Last, First, Middle)

3. Nationality

4. Date of Birth (Month/Day/Year)

5. Social Security Number

6. Verification Number

To: Immigration and Naturalization Service

Attn: Status Verifier/SAVE

From: Typed or Stamped Name and Address of Submitting Agency

7. ☐ Photocopy of Document Attached.
 (If printed on both sides, attach a copy of the front and of the back.)
- ☐ Other Information Attached.

8. (Benefit)	(Your Case Number)
<input type="checkbox"/> AFDC	
<input type="checkbox"/> Education Grant/Loans/Workstudy	
<input type="checkbox"/> Food Stamp	
<input type="checkbox"/> Housing Assistance	
<input type="checkbox"/> Medicaid/Medical Assistance	
<input type="checkbox"/> Unemployment Insurance	
<input type="checkbox"/> Other (specify)	

Name of Submitting Official

Title of Submitting Official

Date

Telephone Number

THE SECTION BELOW FOR INS USE ONLY

INS RESPONSE: From the documents or information submitted and/or a review of our records we find that:

1. ☐ This document appears valid and relates to a **Lawful Permanent Resident alien** of the United States.
2. ☐ This document appears valid and relates to a **Conditional Resident alien** of the United States.
3. ☐ This document appears valid and relates to an alien **authorized employment** as indicated below:
 - a. ☐ Full-Time
 - b. ☐ Part-Time
 - c. ☐ No Expiration (Indefinite)
 - d. ☐ Expires on (Month/Day/Year) _____
4. ☐ This document appears valid and relates to an alien who has an application pending for
 (specify INS benefit): _____
5. ☐ This document relates to an alien having been **granted asylum/refugee** status in the United States.
6. ☐ This document appears valid and relates to an alien **paroled** into the United States pursuant to Section 212 of the I&N Act.
7. ☐ This document appears valid and relates to an alien who is a **Cuban/Haitian entrant**.
8. ☐ This document appears valid and relates to an alien who is a **conditional entrant**.
9. ☐ This document appears valid and relates to an alien who is a **nonimmigrant** (type or class): _____
10. ☐ This document appears valid and relates to an alien **not authorized employment** in the United States.
11. ☐ Continue to process as legal alien. INS is searching indices for further information.
12. ☐ This document is **not valid** because it

appears to be (check all that apply):

- a. ☐ Expired
- b. ☐ Altered
- c. ☐ Counterfeit

Do not write
 in this block:
 For INS status
 verifier use only.

Stamp

☐ Please see reverse for additional comments.

Attachment Three

INS Responses for G-845

1. This document appears valid and relates to a Lawful Permanent Resident alien of the United States: This box reflects a valid I-551, I-181 or I-94 with the notation "Processed for I-551, Temporary Evidence of Lawful Admission for Residence." Immigration law allows this person to live and work in the U.S. on a permanent basis.
2. This document appears valid and relates to a Conditional Resident alien of the United States. This box means a valid I-551, I-181, or I-94 stamped with the notation "Processed for I-551, Temporary Evidence of Lawful Admission for Permanent Residence." This person is allowed to live and work in the U.S. under the law. However, INS will reevaluate their status in two years. Conditional resident alien status normally is granted to aliens that marry U.S. citizens, nationals or permanent resident aliens.
3. This document appears valid and relates to an alien authorized employment as indicated below: This indicates full or part-time employment, and also the period of employment. "Indefinite" will be indicated if there is no specific expiration date for employment eligibility.
4. This document appears valid and relates to an alien who has an application pending for: This box is used to indicate new immigration status or a change in immigration status. If a change of status is pending, the appropriate block indicating their current status also will be checked.
5. This document appears valid and relates to an alien having been granted asylum/refugee status in the U.S.: This box indicates an alien granted temporary refugee status or asylum in the U.S., because of persecution or a well-founded fear of persecution in his country of nationality.
6. This document appears valid and relates to an alien paroled into the U.S. pursuant to Section 212 of the I&N Act: This box shows temporary status for an alien who has entered the U.S. under emergency conditions or in the public's best interest.
7. This document appears valid and relates to an alien who is a Cuban/Haitian entrant: This indicates a temporary status for Cubans who entered the U.S. between April 15, 1980, and October 10, 1980, and also Haitians who entered the country before January 1, 1981.
8. This document appears valid and relates to an alien who is a

conditional entrant: This box reflects a refugee who entered the U.S. or adjusted his status to lawful permanent resident alien under the seventh preference category of Public Law 89-236.

9. This document appears valid and relates to an alien who is a nonimmigrant: This box reflects an alien who is temporarily in the U.S. for a specific purpose such as a student, visitor and foreign governmental official.
10. This document appears valid and relates to an alien not authorized for employment in the U.S. This box is used to indicate the alien's status prohibits employment in the U.S..
11. Continue to process as legal alien. INS is searching indices for further information: This box is used to indicate INS is withholding judgment regarding the status or validity of documentation pending further investigation. It does not mean the applicant is an illegal alien or the holder of fraudulent documentation.
12. This document is not valid because it appears to be: This box reflects expired documentation, altered or counterfeit documents. The back of the G-845 will contain an explanation.
13. This document relates to an alien who has filed an application for U.S. residency pursuant to Section 245(A)(c)(5) of the I&NA (Amnesty/SAW) which requires that your request be accompanied by an original consent of disclosure statement made by the alien applicant prior to INS divulging additional information: This box means you must resubmit the G-845, readable copied documents and a signed consent of disclosure statement.
14. No determination can be made from the information submitted. Please obtain a copy of the original alien registration documentation and resubmit: This directs you to resubmit the G-845 with copies of the original alien documentation.
15. No determination can be made without seeing both sides of the document submitted: The G-845 has to be resubmitted with copies of both sides of each document.
16. Copy of document is not readable: The G-845 has to be resubmitted with higher quality copies of the original alien documentation.
17. INS actively pursues the expulsion of an alien in this class/category. This response means INS will deport the alien.
18. INS is not actively pursuing the expulsion of an alien in

this class/category, at this time. This box reflects the
alien is residing in the United States under color of law
(PRUCOL).

Section II

Immediate Secondary Verification

	Initiate Primary	Immediate Secondary
Valid-appearing I-551, I-151, AR-3A, I-688, I-327, or I-571 with A-Number between A0 000 001 and A59 999 999	X	
Counterfeit-appearing or altered document		X
No A-Number on document		X
A-Number in A60 000 000, A70 000 000, or A80 000 000 series		X
I-689 or I-688A (Requires consent of disclosure)		X
I-181, or I-94 in a foreign passport that bears the endorsement "Temporary Evidence of Lawful Admission for Permanent Residence," processed over one year ago		X
Any INS receipt		X
Other I-181, or endorsed I-94 on a foreign passport	X	

Figure 3A

SAVE
COUNTY INPUT REQUIREMENTS

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REPORT: RS-SAV100-R001
PROGRAM: SAV100

06/24/88
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STATE OF CALIFORNIA - DEPARTMENT OF HEALTH SERVICES
SYSTEMATIC ALIEN VERIFICATION FOR ENTITLEMENTS

IMMIGRATION AND NATURALIZATION SERVICE RESPONSE

COUNTY: _____ DISTRICT: _____ WORKER: _____

CASE-NAME-OR-NUMBER: _____ NAME: _____

ALIEN-NUMBER : _____

LAST-NAME : _____

FIRST-NAME : _____

DATE-OF-BIRTH : _____

COUNTRY-OF-BIRTH : _____

SSN : _____

DATE-OF-ENTRY : _____

EMPLOYMENT-ELIGIBILITY-MESSAGE

* * * * *
* * * * *
* * * * *
* * * * *

BATCH CONTROL NO. : _____

July 25, 1988